

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BENJAMIN BIN CHOW,

Plaintiff,

v.

C.A. No. 22-947-JLH-SRF

CANYON BRIDGE CAPITAL PARTNERS,  
LLC, *et al.*,

Defendant.

**DECLARATION OF DANIEL A. TAYLOR IN SUPPORT PLAINTIFF'S ANSWERING  
BRIEF IN OPPOSITION TO DEFENDANTS' EMERGENCY MOTION (D.I. 53)**

I, Daniel A. Taylor, declare:

1. I am an attorney at the law firm of Smith, Katzenstein & Jenkins LLP, a member in good standing of the bars of the Supreme Court of Delaware, the Supreme Judicial Court of Massachusetts, and the Supreme Court of Pennsylvania, and counsel for Plaintiff Benjamin Bin Chow in the above-captioned matter. As such, I have personal knowledge of the facts set forth herein.

2. This Declaration is submitted in support of Plaintiff's Answering Brief in Opposition to Defendants' Emergency Motion (D.I. 53).

3. Attached hereto as **Exhibit 1** is a true and correct copy of the joint proposed scheduling order that I sent via email to Delaware counsel of record for Defendants in the above-captioned matter on September 9, 2024.

4. To date, counsel for Defendants has not responded to either the email or this proposed scheduling order.

I declare under penalty of perjury that the foregoing statements made by me are true and correct to the best of my knowledge and belief.

Dated: September 12, 2024

/s/ Daniel A. Taylor  
Daniel A. Taylor